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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

**LEGACY EMANUEL HOSPITAL &
HEALTH CENTER *et al.***

Plaintiffs/Cross-
Defendants

vs

SEJAL HATHI, MD *et al.*

Defendants

Case No. 6:22-cv-01460-AN

**MENTAL HEALTH ASSOCIATION
OF PORTLAND'S MOTION FOR
EXTENSION OF TIME TO FILE
REPLY IN SUPPORT OF MENTAL
HEALTH ASSOCIATION'S MOTION
TO INTERVENE**

LR 7-1 CERTIFICATION

Pursuant to Local Rule 7-1, Juan Chavez, counsel for Mental Health Association of Portland, hereby certifies that he conferred with counsel for Hospital Corporation Plaintiffs, and they do not oppose this motion.

RELIEF REQUESTED

Plaintiff requests an extension of the deadline to file a reply in support of Mental Health Association of Portland's Motion to Intervene.

UNOPPOSED MOTION FOR EXTENSION OF TIME

ARGUMENT AND AUTHORITY

Case schedules can be modified and extended based upon showings of “good cause.” Fed. R. Civ. P. 16(b)(4). The current reply deadline is January 17, 2025. Mental Health Association of Portland requests an extension of the reply deadline to January 21, 2025 to allow adequate time for response drafting. MHAP’s counsel is involved in two cases with trials presently scheduled in February 2025. MHAP believes that this extension will be adequate to complete briefing.

CONCLUSION

Based on the foregoing, Plaintiff requests that this motion be granted, and that the new deadlines be set.

DATED: January 14, 2025.

/s/ Juan C. Chavez
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Attorney for Plaintiff